

# Exhibit 13

**Thomas, Patrick**

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**From:** Slachetka, Meg <MSlachetka@lowenstein.com>  
**Sent:** Tuesday, April 7, 2020 1:48 PM  
**To:** 'dchiorean@odrlaw.com'  
**Cc:** Blad, Leiv; Fazli, Ario; 'dlitvin@garwingerstein.com'; 'rvandermeulen@labaton.com'; 'delman@gelaw.com'; 'cletter@odrlaw.com'; 'ktucker@gelaw.com'; 'ccoslett@bm.net'  
**Subject:** RE: In re Novartis and Par Antitrust Litig.

Dan -

As my colleagues informed you during a call on March 10<sup>th</sup>, Lupin disagrees both with Plaintiffs' characterization of the documents you seek as "missing" and with Plaintiffs' belief that Lupin's production to date is insufficient or in any way deficient. Lupin acquired Novel Laboratories in early 2016, and many former Novel employees with relevant knowledge of these issues are no longer employed by Lupin. Nevertheless, we have worked in good faith over many months to endeavor to locate and produce documents responsive to Plaintiffs' evolving demands. Frankly, it is our expectation that Lupin is in possession of no other documents responsive to the subpoena. However, the current coronavirus pandemic has made it even more difficult for our client to address Plaintiffs' latest series of questions, or otherwise to definitively confirm that no such documents exist.

Lupin continues to work in good faith to investigate the questions you raised on March 10<sup>th</sup>, but we are not in a position to comply with your unreasonable April 10<sup>th</sup> deadline, nor to set a date certain by which we will have answers to your questions. We disagree that we have reached impasse, and will advise you as soon as we have more information to share. We hope that you and your colleagues remain well.

Best,  
Meg

**Meg Slachetka**  
Counsel  
Lowenstein Sandler LLP

T: 212.419.5856  
F: 973.422.6783



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**From:** Fazli, Ario <AFazli@lowenstein.com>  
**Sent:** Tuesday, April 7, 2020 11:23 AM  
**To:** Slachetka, Meg <MSlachetka@lowenstein.com>  
**Cc:** Blad, Leiv <LBlad@lowenstein.com>  
**Subject:** Fwd: In re Novartis and Par Antitrust Litig.

Begin forwarded message:

**From:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>

**Date:** April 7, 2020 at 11:16:53 AM EDT

**To:** "Fazli, Ario" <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>, "Daniel Litvin" ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>, "[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)" <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>, "[delman@gelaw.com](mailto:delman@gelaw.com)" <[delman@gelaw.com](mailto:delman@gelaw.com)>, Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>, "[ktucker@gelaw.com](mailto:ktucker@gelaw.com)" <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>, "Caitlin G. Coslett" ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Cc:** "Blad, Leiv" <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>, "Murillo, Edoardo" <[EMurillo@lowenstein.com](mailto:EMurillo@lowenstein.com)>, "Rosado-Diaz, Judy" <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig.

Hi Ario,

It has now been nearly a month since we spoke, and we have received no word from Lupin on the timing of production of Lupin's missing documents. Moreover, it has been twelve months since Plaintiffs and Lupin agreed upon the scope of Lupin's production, and seventeen months since Plaintiffs served our subpoena.

Plaintiffs request that Lupin immediately, but no later than Friday April 10, 2020, (1) produce the missing documents and answer Plaintiffs' data questions, or (2) provide Plaintiffs with an exact date when Lupin will complete its production and answer Plaintiffs' data questions in the near future.

Plaintiffs will interpret silence from Lupin on this matter as a sign that we have reached impasse, and proceed accordingly to seek redress from the court.

Thanks,  
DC

**Dan Chiorean**

Odom & Des Roches, LLC  
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**From:** Dan Chiorean

**Sent:** Monday, March 23, 2020 4:09 PM

**To:** Fazli, Ario <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>; Daniel Litvin ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; '[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; '[delman@gelaw.com](mailto:delman@gelaw.com)' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; '[ktucker@gelaw.com](mailto:ktucker@gelaw.com)' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Murillo, Edoardo <[EMurillo@lowenstein.com](mailto:EMurillo@lowenstein.com)>; Rosado-Diaz, Judy <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig.

Hi Ario,

I'm checking in again if you've had an opportunity to discuss with your client and have a timeline for producing the documents.

Thanks,

DC

**Dan Chiorean**

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**From:** Dan Chiorean

**Sent:** Wednesday, March 18, 2020 3:42 PM

**To:** Fazli, Ario <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>; Daniel Litvin ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'rvandermeulen@labaton.com' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'delman@gelaw.com' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'ktucker@gelaw.com' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Murillo, Edoardo <[EMurillo@lowenstein.com](mailto:EMurillo@lowenstein.com)>; Rosado-Diaz, Judy <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig.

Hi Ario,

Do you have a timeline for production of the Lupin and Novel documents we discussed on our call last week?

Thanks,  
DC

**Dan Chiorean**

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**From:** Fazli, Ario <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>

**Sent:** Monday, March 9, 2020 2:52 PM

**To:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>; Daniel Litvin ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'rvandermeulen@labaton.com' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'delman@gelaw.com' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'ktucker@gelaw.com' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Murillo, Edoardo <[EMurillo@lowenstein.com](mailto:EMurillo@lowenstein.com)>; Rosado-Diaz,

Judy <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig.

Hi Dan,

We are available to discuss tomorrow afternoon. If you are available tomorrow afternoon, please circulate a dial-in that we can use.

Thank you,  
Ario

**Ario Fazli**  
Associate  
Lowenstein Sandler LLP

T: 202.753.3778

---

**From:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>

**Sent:** Monday, March 09, 2020 10:57 AM

**To:** Fazli, Ario <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>; Daniel Litvin ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'rvandermeulen@labaton.com' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'delman@gelaw.com' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'ktucker@gelaw.com' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Murillo, Edoardo <[EMurillo@lowenstein.com](mailto:EMurillo@lowenstein.com)>; Rosado-Diaz, Judy <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig.

Good morning Ario,

We've completed review of Lupin and Novel's productions. Do you have availability to discuss, perhaps tomorrow?

Thanks,  
DC

**Dan Chiorean**  
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---

**From:** Fazli, Ario <[AFazli@lowenstein.com](mailto:AFazli@lowenstein.com)>

**Sent:** Friday, February 28, 2020 11:12 AM

**To:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>; Daniel Litvin ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com))

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Judy <[jrosadodiaz@lowenstein.com](mailto:jrosadodiaz@lowenstein.com)>  
**Subject:** In re Novartis and Par Antitrust Litig.

Counsel,

Please see the attached correspondence. The referenced Sharefile link is below, and the password will be sent to you via separate cover.

<https://lowensteinsandler.sharefile.com/d-s810b0008d16455ca>

Regards,  
Ario

**Ario Fazli**  
Associate  
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